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January 28, 2020

Via ECF

Hon. J. Paul Oetken
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: National Jewish Democratic Council, et al., v. Adelson, 18-cv-08787-JPO

Dear Judge Oetken:

We write on behalf of Plaintiffs National Jewish Democratic Council, Marc Stanley, and David Harris, pursuant to your Individual Rules 1(A) and 3(C), to request that the Court adjourn the deadline to complete expert discovery and the pretrial conference currently scheduled for February 3, 2020. We have conferred with counsel for Defendant Sheldon Adelson, and they consent to these requests.

On December 12, 2019, the Court entered a minute order adjourning the deadline to complete discovery until March 31, 2020. The minute order was silent on the deadline to complete expert discovery and the pretrial conference. Accordingly, we request that the Court adjourn the deadline to complete expert discovery until May 15, 2020, and that the Court adjourn the interim deadlines as follows: (a) Plaintiffs' expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) shall be made on or before March 31, 2020; (b) Defendant's expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) shall be made on or before April 14, 2020; and (c) these interim deadlines may be extended by written consent of all parties without application to the Court, provided that expert discovery is completed by May 15, 2020. The parties have submitted no previous requests to adjourn the expert discovery deadlines.

We also request that the Court adjourn the pretrial conference currently scheduled for February 3, 2020, until any date after May 15, 2020. The Court previously adjourned the pretrial

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conference from August 1, 2019 to November 26, 2019, and from November 26, 2019 to February 3, 2020.

Respectfully submitted,

/s

Richard D. Emery

cc. All counsel of record